

APPENDIX B

**JJHCS INDEX IN SUPPORT OF MOTION TO SEAL
LETTERS TO JUDGE WOLFSON REGARDING THE MOTION TO COMPEL INTERROGATORY RESPONSES
(MARCH 12, 20 & 22, 2024)**

Material/Title of Document	Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
Letter from George LoBiondo (Mar. 22, 2024) 2024.03.22 JJHCS reply re_ MTC ROG responses					
<u>Redactions to Plaintiff's Fifth Request for the Production of Documents</u> JJHCS Exhibit 38	JJHCS requests the sealing of certain redactions to Exhibit 38 to the March 22 letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this information contains sensitive business information produced by non-party Archbow.	<p>If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS and Archbow's sensitive business information.</p> <p>Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable. JJHCS is producing redacted public versions.	None	None

Material/Title of Document	Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
		competitors secured the information.			